

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11  
:  
Gawker Media LLC, et al.,<sup>1</sup> : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
:  
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**SUPPLEMENTAL DECLARATION OF GREGG M. GALARDI IN  
SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF AN  
ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF  
ROPES & GRAY LLP AS ATTORNEYS FOR THE DEBTORS AND DEBTORS IN  
POSSESSION EFFECTIVE NUNC PRO TUNC TO THE PETITION DATE**

I, Gregg M. Galardi, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a partner of the firm of Ropes & Gray LLP ("Ropes & Gray"), which maintains offices at 1211 Avenue of the Americas, New York, New York 10036. I am the lead attorney from Ropes & Gray working on the above-captioned chapter 11 cases. I am a member in good standing of the Bar of the State of New York, and I have been admitted to practice in the United States Bankruptcy Court for the Southern District of New York. There are no disciplinary proceedings pending against me.

2. I submit this supplemental declaration (the "Supplemental Declaration") on behalf of Ropes & Gray to supplement my prior declaration dated June 20, 2016 [Ex. B to Docket No.

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<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.'s offices are located at Andrássy út 66. 1062 Budapest, Hungary.

57] (the “Original Declaration”).<sup>2</sup> Except as otherwise noted, I have personal knowledge of the matters set forth herein.

**Additional Disclosures of Relationships**

3. Since the filing of the Original Declaration, Ropes & Gray has identified connections with additional potential parties in interest, as set forth on **Exhibit A** annexed hereto.

4. For the avoidance of doubt, Ropes & Gray will not commence a cause of action in these chapter 11 cases against the entities listed on **Exhibit A** that are current or ongoing clients of Ropes & Gray unless Ropes & Gray has an applicable waiver on file or first receives a waiver from such entity allowing Ropes & Gray to commence such an action. To the extent that a waiver does not exist or is not obtained from such entity and is necessary for the Debtors to commence an action against that client, the Debtors will be represented in such particular matter by conflicts counsel.

5. None of the entities listed on Exhibit A represent more than one percent of Ropes & Gray’s fee receipts for the twelve month period ending May 31, 2016.

6. Except as otherwise noted in the Original Declaration, to the best of my knowledge and information, Ropes & Gray does not have any interest materially adverse to the interests of the Debtors’ estates or any class of creditors of the Debtors, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors. To the best of my knowledge and information, Ropes & Gray and its partners and employees neither hold nor represent any interest adverse to the Debtors in connection with these chapter 11 cases. Based

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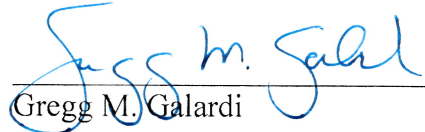
<sup>2</sup> Capitalized terms used herein, but not otherwise defined, shall have the meanings ascribed in the Original Declaration.

upon the information available to me, I believe that Ropes & Gray is a “disinterested person” within the meaning of Bankruptcy Code section 101(14).

7. To the extent necessary, Ropes & Gray will update the information disclosed herein by filing a supplemental declaration pursuant to Bankruptcy Rule 2014 and Local Rules 2014-1.

8. I will amend this statement immediately upon learning that (i) any of the within representations are incorrect or (ii) there is any change of circumstances relating thereto.

Dated: July 6, 2016

  
Gregg M. Galardi

**Exhibit A**

The following lists the names of entities searched from Schedule 1 to the Debtors Application for Entry of an Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors and Debtors in Possession Effective Nunc Pro Tunc to the Petition Date [Docket No. 57], where the entity, and/or a parent or affiliate of the entity, is a current or former client of Ropes & Gray on matters that, on information and belief, are unrelated to the Debtors:

| <b><u>Searched Entity</u></b>               | <b><u>Name of Entity and/or Affiliate of Entity, that is a R&amp;G Client</u></b>  | <b><u>Relationship</u></b>                                    |
|---|--|---|
| Fidelity 401k                               | FMR Corp   | Current client in matters unrelated to these chapter 11 cases |
| Fidelity 401k                               | Fidelity Advisor Series I Fidelity Advisor Leveraged Company Stock Fund<br><br>Fidelity Advisor Series II Fidelity Advisor High Income Advantage<br><br>Fidelity Securities Fund<br><br>Pension Investment Committee of General Motors for General Motors Employees Domestic Group Pension Trust | Former clients in matters unrelated to these chapter 11 cases |
| International Business Machines Corporation | International Business Machines Corporation  | Former client in matters unrelated to these chapter 11 cases  |
| MillerCoors LLC                             | MillerCoors LLC  | Former client in matters unrelated to these chapter 11 cases  |
| Federal Insurance Company                   | Lloyds Underwriters at Interest  | Current client in matters unrelated to these chapter 11 cases |
| Hartford Casualty Insurance Company         | Hartford Financial Services Group Inc.   | Current Client in matters unrelated to these chapter 11 cases |
| Scott Tillman                               | Scott Tillman  | Former client in matters unrelated to these chapter 11 cases  |
| ShoreTel Inc.                               | ShoreTel Inc.  | Former client in matters unrelated to these chapter 11 cases  |

|   |                                 |   |
|---|---------------------------------|---|
| Amex Corporate GM   | American Express Company Inc.   | Former client in matters unrelated to these chapter 11 cases        |
| Apple, Inc.   | Apple, Inc.                     | Current client in matters unrelated to these chapter 11 cases       |
| Bird & Bird LLP   | Bird & Bird LLP                 | Former client in matters unrelated to these chapter 11 cases        |
| Cerberus Capital Management LP  | Cerberus Capital Management LP  | Former client in matters unrelated to these chapter 11 cases        |
| Netratings  | VNU Marketing Information, Inc. | Former client in matters unrelated to these chapter 11 cases        |
| DraftKings, Inc.  | DraftKings, Inc.                | Current client in matters unrelated to these chapter 11 cases       |
| Newmark & Co. Real Estate, Inc.   | BGC Financial LP                | Former client in matters unrelated to these chapter 11 cases        |
| Lewis Rice & Fingersh LLC<br>Reimer & Braunstein  |                                 | Member of Attorneys' Liability Assurance Society, Inc. <sup>3</sup> |
| Susan Arbeit, Trial Attorney for the United States Trustee, Region 2, Southern District of New York |                                 | Colleague of Mr. Galardi's at former law firm                       |

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<sup>3</sup> Ropes & Gray is also a member of the Attorneys' Liability Assurance Society, Inc., which provides malpractice and other insurance services to its member law firms.